

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MASSACHUSETTS MUTUAL LIFE
INSURANCE COMPANY,

Plaintiff,

v.

MERRILL LYNCH, PIERCE, FENNER
& SMITH INC.; DEUTSCHE BANK
SECURITIES INC.; GOLDMAN,
SACHS & CO., INC.; J.P. MORGAN
SECURITIES LLC; and RBS
SECURITIES INC.,

Defendants.

Civil Action No. 3:11-cv-30285-MAP

Oral Argument Requested

DECLARATION OF KAMIL E. REDMOND

I, Kamil E. Redmond, make this declaration pursuant to 28 U.S.C. § 1746. I hereby state as follows:

1. I am associated with the law firm of Sullivan & Cromwell LLP, counsel for Defendant Goldman, Sachs & Co. in the above-captioned action, and am admitted *pro hac vice* in the above-captioned action.

2. I respectfully submit this Declaration in support of Defendants' Cross-Motion to Compel Discovery Responses.

3. Attached hereto as Exhibit A is a true and correct copy of Defendants' First Set of Requests for the Production of Documents, served on August 6, 2012.

4. Attached hereto as Exhibit B is a true and correct copy of Plaintiff's Responses and Objections to Defendants' First Set of Requests for the Production of Documents, served on September 6, 2012.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 16, 2012
New York, New York

/s/
Kamil E. Redmond

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a true and correct copy of this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NE) and paper copies will be sent to those indicated as nonregistered participants on October 16, 2012.

Dated: October 16, 2012

/s/ Zachary C. Kleinsasser

Zachary C. Kleinsasser